STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION DIVISION FOR THE PURPOSE OF CONSIDERING:

CASE NO. 10654

APPLICATION OF WARRIOR, INC. FOR AN UNORTHODOX OIL WELL LOCATION, EUMONT OIL POOL, LEA COUNTY, NEW MEXICO

JAN 5 1993 OIL CONSERVATION DIVISION

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by WARRIOR, INC. as required by the Oil Conservation Division.

APPEARANCE OF PARTIES

APPLICANT

WARRIOR, INC.
P.O. Box 5970
Hobbs, NM 88241-5970
ATTN: M.Y. "Merch" Merchant

ATTORNEY

W. Thomas Kellahin KELLAHIN AND KELLAHIN P.O. Box 2265 Santa Fe, NM 87504 (505) 982-4285

OPPOSITION OR OTHER PARTY

ATTORNEY

N/A

MAL.

STATEMENT OF CASE

APPLICANT

Warrior, Inc. ("Warrior"), Applicant, is the operator of a leasehold waterflood project in the Eumont Oil Pool consisting of the W/2 of Section 26 and the NE/4 of Section 27, Township 27 South, Range 36 East, NMPM.

On August 7, 1991, the Division approved a one-well injection program for the project with the injection well located in the approximate center of the NE/4 of said Section 27.

Now, Warrior seeks to drill a producing well in the approximate center of the SW/4 of said Section 26 equidistant from the four (4) current producers operating in the Section. If the well is not commercial in the Eumont Oil Pool, then Warrior will have placed the well at the optimum location for use as an injection well.

Warrior has notified all offsetting interest owners and is not aware of any opposition to this Application.

OPPOSITION OR OTHER PARTY

PROPOSED EVIDENCE

APPLICANT

WITNESSES EST. TIME EXHIBITS

M.Y. "Merch" Merchant 20 Minutes Approx. 5

Petroleum Engineer

OPPOSITION

WITNESSES EST. TIME EXHIBITS

N/A

PROCEDURAL MATTERS

None applicable at this time.

KELLAHIN AND KELLAHIN

W. Thomas Kellahin

P.O. Box 2265

Santa Fe, New Mexico 87504

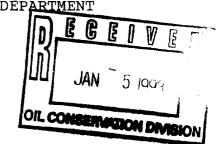
(505) 982-4285

ATTORNEYS FOR WARRIOR, INC.

STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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WITNESSES EST. TIME EXHIBITS

M.Y. "Merch" Merchant 20 Minutes Approx. 5
Petroleum Engineer

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OPPOSITION

WITNESSES EST. TIME EXHIBITS

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PROCEDURAL MATTERS

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KELLAHIN AND KELLAHIN

W. Thomas Kellahin

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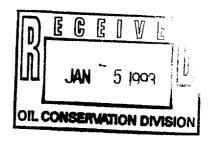
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M.Y. "Merch" Merchant 20 Minutes Approx. 5 Petroleum Engineer

<u>OPPOSITION</u>

WITNESSES EST. TIME **EXHIBITS**

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PROCEDURAL MATTERS

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